

CASE NO. 15-72120

IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

AMERICAN BAPTIST HOMES OF THE WEST
D/B/A PIEDMONT GARDENS,

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent,

and

SERVICE EMPLOYEES INTERNATIONAL UNION,
UNITED HEALTHCARE WORKERS – WEST

Proposed Intervenor.

ON APPEAL FROM NLRB
CASE NO.: 32-CA-063475

MOTION TO INTERVENE ON BEHALF OF SERVICE EMPLOYEES
INTERNATIONAL UNION,
UNITED HEALTHCARE WORKERS – WEST

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ATTORNEYS FOR PROPOSED INTERVENOR,
SERVICE EMPLOYEES INTERNATIONAL UNION,
UNITED HEALTHCARE WORKERS – WEST

Service Employees International Union, United Healthcare Workers – West, the Proposed Intervenor in this matter hereby moves this Court for an Order permitting it to intervene in this proceeding. Intervention is sought under Federal Rule of Appellate Procedure 15.

Normally Charging Parties such as Service Employees International Union, United Healthcare Workers – West are permitted intervention in these proceedings seeking enforcement of an Order of the National Labor Relations Board. See *International Union, UAW, Local 283 v. Scofield* (1965) 382 U.S. 205, 208. Indeed *Scofield* holds that Charging Parties such as Service Employees International Union, United Healthcare Workers – West are normally entitled to intervention in the Circuit Court.

Date: August 5, 2015

Respectfully Submitted

By: /S/ DAVID A. ROSENFELD
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Attorneys For Proposed Intervenor,
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CERTIFICATE OF SERVICE

I am a citizen of the United States and an employee in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501.

I hereby certify that on August 5, 2015, I electronically filed the forgoing **MOTION TO INTERVENE ON BEHALF OF SERVICE EMPLOYEES INTERNATIONAL UNION, UNITED HEALTHCARE WORKERS – WEST** with the United States Court of Appeals For The Ninth Circuit, by using the Court's CM/ECF system.

I certify that all participants in the case that are registered CM/ECF users will receive service by the Notice of Electronic Filing by CM/ECF system.

I certify under penalty of perjury that the above is true and correct.
Executed at Alameda, California, on August 5, 2015.

/s/ Mary Piro

Mary Piro